



SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

(Including the Prevent Strategy)

Appendix 1: Signs and indicators of abuse

Appendix 2: Supporting the Rehabilitation of Offenders.

Appendix 3: Prevent Strategy

Issue:	7	Prepared by:	Authorised by:
Original Issue Date:	March 2012	Equality, Inclusion and Safeguarding Manager	Principal
Reviewed:	November 2016		Approved by:
Next Review:	January 2018	1 Year	Corporation

Links with other Policies

The Safeguarding Children and Vulnerable Adults Policy has obvious links with the wider Safeguarding agenda, and staff and governors should always be aware of the impact this policy has on other related issues. For example, when agreeing or reviewing a policy for safeguarding, links should be made with a range of other guidelines and procedures:-

- Educational visits
- Health & Safety
- Behaviour
- Anti-Bullying
- Confidentiality
- Care, Control & Restraint
- Attendance
- Safe Working Practice
- Forced Marriage
- Child Sexual Exploitation
- Children as Young Carers
- Equality Inclusion & SEN
- Children in Public Care
- Children Missing Education
- Female Genital Mutilation
- E-Safety
- Guidance on Exclusions
- Private Fostering

Definitions:

e.g. The policy recognises the following definitions with regard to the individual.

- (a) Student – the term ‘student’ for this policy covers students of the College. The policy also covers those students who are on work placement as part of their course. In addition it also covers school links students and students visiting the College or who are on tasters.
- (b) Child – in accordance with The Children Act 1989, and therefore in accordance with law, the College shall regard any young person who is 17 years and under as a child. Young people aged 18 and over may in some circumstances be regarded as vulnerable and may therefore fall within the remit of the Act.
- (c) Vulnerable Adult – may be in need of community care services by reason of mental or other disability, age or illness and who is, or may be unable to take care of himself or herself, or unable to protect himself or herself against significant harm or serious exploitation. Vulnerability can apply to a wide range of disabilities and situations including those adults at risk owing to their caring role or family responsibilities.
- (d) Other Vulnerable Adult – College term to cover any student displaying signs of significant stress or trauma who may be in need of support.
- (e) Staff – covers all staff, whether teaching, administrative, management or support, as well as volunteers and regular contractors (i.e security / cleaning staff).

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

1. Introduction

Leeds College of Building is committed to safeguarding and promoting the welfare of all students. We believe all staff and visitors have an important and unique role to play in safeguarding children and vulnerable adults.

We believe:

- The College can contribute to the prevention of abuse.
- All children and vulnerable adults have the right to be protected from harm.
- Students need support which matches their individual needs, including those who may have experienced abuse.
- Students need to be safe and feel safe in College.

Leeds College of Building will fulfil local and national responsibilities as laid out in the following documents:-

- Keeping Children Safe in Education – Statutory guidance for schools and colleges, (September 2016)
- Working Together to Safeguard Children, March 2015 (Statutory guidance)
- Statutory guidance on children who run away or go missing from home or care – January 2014
- What to do if you're worried a child is being abused – March 2015
- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers – March 2015
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium October 2015)
- Leeds Safeguarding Children Board Procedures
- Children Act 1989 (as amended 2004 Section 52)
- Education Act 2002 s175/s157
- The Teachers Standards' 2012
- The Counter-Terrorism and Security Act 2015 (section 26 The Prevent Duty)
- Female Genital Mutilation Act 2003
- Serious Crime Act 2015
- Children Missing Education – Statutory guidance for local authorities (DfE September 2016).

2. Overall Aims

To contribute to the prevention of abusive experiences in the following ways:

- Clarifying standards of behaviour for staff and students
- Introducing appropriate work within the curriculum
- Developing staff awareness of the causes of abuse
- Encouraging students and parental participation in practice
- Addressing concerns at the earliest possible stage

To contribute to the protection of students in the following ways:

- Inclusion of appropriate work within the curriculum
- Implementing child protection policies and procedures

- Working in partnership with students, parents and agencies
- Ensure all children feel safe, are treated as individuals and their rights, values and beliefs are respected.

To contribute to supporting students in the following ways:

- Identifying individual needs where possible
- Designing plans to meet student needs

3. All staff will:

- Read, understand and be familiar with Part One of Keeping Children Safe in Education (DfE 2016)
- Be familiar with the College's Safeguarding Children and Vulnerable Adults Policy including issues of confidentiality.
- Be alert to signs and indicators of possible abuse. See **Appendix One** for current definitions of abuse and examples of harm.
- Record concerns on an electronic "Cause for Concern" form. The "Cause for Concern" form, once completed, must be handed to Jubar Miah – Equality, Inclusion and Safeguarding Advisor.
- Deal with a disclosure of abuse from a student in line with the recommendations in Appendix One. These must be passed to one of the Designated Staff immediately, followed by a written account.
- ***Be prepared to identify children who may benefit from Early Help.***
- Be involved in ongoing monitoring and recording to support the implementation of individual education programmes and interagency child protection and child support plans.
- Be subject to Safer Recruitment processes and checks whether they are new staff, supply staff, contractors, volunteers etc.
- Will be expected to behave in accordance with Guidance for Safer Working Practice for those Working with Children and Young People in Education settings (Safer Recruitment Consortium October 2015).

4. The Safeguarding Team

4.1 The Designated Governor

Julia Evens is the governor who has designated responsibility for child protection and safeguarding.

- She is responsible for liaising with the Principal / Designated Senior Safeguarding Lead over all matters regarding child protection issues. The role is strategic rather than operational – she will not be involved in concerns about individual students.

- **Julia** will support the designated Senior Safeguarding Lead in their role from the perspective of ensuring the allocation of funding and resource is sufficient to meet the current safeguarding adults and child protection activity.
- The Designated Senior Safeguarding Lead and Designated Governor will be responsible for providing an annual report to the governing body of child protection activity and completing the annual review of child protection monitoring submission to the local authority/LSCB; accurately reflecting the safeguarding arrangements of the College
- The governing body should have safeguarding training on their strategic responsibilities every three years, in order to provide appropriate challenge and support for any action, to progress areas of weakness or development in the College's safeguarding arrangements.
- The Chair of the Board is nominated to liaise with the local authority and/or partner agencies on issues of safeguarding and in the event of allegations of abuse made against the Principal or the College or member of the governing body.
- The Designated Governor will ensure that an appropriate framework is in place for internet filters and web-use monitoring systems. Students should not be able to access harmful or inappropriate material from the Colleges IT system.

4.2 The Designated Senior Safeguarding Lead

The College's Designated Safeguarding Lead on the Senior Management Team who has lead responsibility and management oversight/accountability for Safeguarding is Karen Rolinson – Director of Human Resources and Organisational Development.

The Designated Senior Safeguarding Lead is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant agencies.
- Ensuring that parents of children and young people within the College have access to the College's Safeguarding Children and Vulnerable Adults Policy.
- Ensure all staff working at the College (inc. 3rd party contracted staff) read, understand and fully comply with the Keeping Children Safe in Education 2016 statutory guidance.
- Ensuring that staff receive basic training in safeguarding issues and are aware of and understand the College safeguarding procedures.
- Ensure that all staff involved in direct case work of vulnerable children, where there are safeguarding concerns/issues; have access to regular safeguarding supervision.
- Ensuring safer recruitment practices are in place.
- Ensuring that counselling and supervision arrangements are in place to provide support to any of the designated members of the Safeguarding Team.
- Liaising with the Principal to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

The Designated Senior Lead will provide an annual report to the governing body of the College setting out how the College has discharged its duties. She is responsible for reporting deficiencies in procedure or policy identified by the LSCB (or others) to the governing body at the earliest opportunity.

4.3 The Safeguarding Manager (Designated Safeguarding Lead)

The Designated Senior Safeguarding Lead is supported by Jubar Miah – Equality, Inclusion and Safeguarding Manager. He is responsible for the effective management of all safeguarding cases. His specific responsibilities include;

- Take overall case management responsibility for safeguarding cases at the College along with the designated safeguarding Lead.
- To implement the Keeping Children Safe in Education 2016 statutory guidance at the College.
- Referring all cases of suspected abuse to Children’s Social Work Service (CSWS) Duty and Advice Team. KCSiE (DfE 2016) states that anyone in the school setting can make a referral. If this is the case the DSL should be informed as soon as possible, that a referral has been made. Wherever possible referrals to CSWS should be done by appropriately trained designated safeguarding staff.
- Ensuring advice, support and training to staff on issues relating to safeguarding issues is provided.
- Ensuring a proper record of any safeguarding referral, complaint or concern is securely kept, (even where that concern does not lead to a referral).
- Liaising with the Local Authority, LSCB and other appropriate agencies.
- Liaising takes place with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils.
- Liaising takes place with employers and training organisations that receive students from the College on placements to ensure that appropriate safeguards are put in place.
- Ensure regular case monitoring and reviews of vulnerable children with the Safeguarding Officers Team.
- Chair the planning meetings for the most serious or complex child protection / safeguarding cases & attend any associated external meetings where attendance is mandatory for these cases.
- Complete the risk assessments for the most serious cases where students who pose a risk to themselves or others in the College community.
- Provide advice, support, training and briefings to the designated Safeguarding Team and other College staff.
- Advise, coach and mentor the Safeguarding Team on the full range of child protection and safeguarding issues to support the development of their capabilities and skills around case management.
- Make safeguarding enquiries with schools about potential students who are going through the application process.

4.4 The Safeguarding Officers

The College’s Safeguarding Team will have Designated Safeguarding Officers. The Safeguarding Officers will support the Safeguarding Manager and the Designated Senior Lead to effectively case manage safeguarding referrals at the College.

The full time Safeguarding Officer will have additional responsibilities to develop and deliver the safeguarding preventative curriculum. All safeguarding officers will work effectively with the full time Safeguarding Officer to provide support to any students who have criminal convictions or who are looked after.

The Safeguarding Officers are:

- Charlotte Duffy Safeguarding Officer (Full Time)
Additional Responsibilities include
 - Development and delivery of the Preventative Curriculum
 - Co-ordinate the risk assessment and support for the rehabilitation of offenders
 - Co-ordinate the support for the cases where children are looked after

- Wayne Chappelow Assistant Faculty Director
- Chris Tunningley Assistant Faculty Director
- Mark Cawood Assistant Faculty Director
- Robert J Smith Work Based Learning Manager
- Marc Townsend Personal Advisor
- Jill Breakwell Personal Advisor
- Michelle Sowe Personal Advisor
- Sam Cheetham Personal Advisor
- Liz Smith Personal Advisor
- Helen Connell Personal Advisor

The Safeguarding Officers will:

- Be available to listen to children, young people and vulnerable adults studying at the College.
- Ensure safeguarding information is dealt with in a confidential manner. A written record will be made of what information has been shared with who and when. Staff will be informed of relevant details only when the Safeguarding Manager feels their having knowledge of a situation will improve their ability to meet the needs of an individual child and /or family.
- Complete relevant assessment frameworks for identifying and supporting students who are on the safeguarding register.
- Liaise effectively with external agencies (such as Youth Offending Services, Probation, Social Workers)
- Participate in planning and review meetings and attend external meetings where attendance is mandatory.
- Monitor and update any safeguarding plan / Risk Assessment(s) with college staff and agencies (specifically Child In Need Plans, Child Protection Plans or Early Help Plans).
- Keep detailed, accurate, secure written records of concerns and referrals, which clearly reflect the wishes and feelings of the child.
- Attend all Safeguarding Officers Team Meetings and all Planned Supervision Meetings.
- Must obtain access to resources and attend any relevant or refresher training courses.

4.6 Training for Designated Safeguarding Staff

Designated Safeguarding Staff will receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff and volunteer has access to and understands the College's Safeguarding Children and Vulnerable Adults Policy and procedures, including new and part time staff.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.

5.0 Raising Awareness

- The Designated Senior Safeguarding Lead and the Safeguarding Manager should ensure the College's Policies are known and used appropriately:
- Ensure the College's Safeguarding Children and Vulnerable Adults Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this.
- Ensure the Safeguarding Children and Vulnerable Adults Policy is available on request, and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this.
- Link with the local authority and LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

6.0 Confidentiality, Privacy and Data Sharing

The College is committed to working with other agencies to ensure that public services are co-ordinated around the needs of the individual. Sharing information with other agencies is essential for early intervention and preventive work, safeguarding, promoting welfare and for wider public protection.

To maintain the privacy rights of all individuals, the College will ensure that students remain confident that their personal information is kept safe and secure.

The College recognises that in some circumstances, there can be significant consequences of not sharing information with other agencies. In principle, decisions to share information about students with other agencies, in cases where consent has been withheld, will be taken on a case by case basis using the professional judgement of managers and designated staff.

6.1 Child Protection Records

Child protection files will be held in a locked cabinet and/or secure electronic file and with only the designated Safeguarding Team and Principal having access.

The required information includes the following specific items:

- Cause for concern forms
 - Safeguarding reports/disclosures
 - Minutes of child protection conferences
 - A copy of the child protection plan
 - A copy of support plan for the student
- Each child protection file should contain a chronological summary of significant events and the actions and involvement of the College.
 - Where students leave to go onto other educational establishments, the College will ensure, where it is necessary to do so, that the safeguarding file is transferred securely and separately from the main student file to the receiving educational establishment. The College will aim to gain the consent of the student before any data is transferred, however we may share information without the consent of the student if there are any overriding concerns outlined in **Section 6.5** of this policy.
 - For audit purposes a note of all pupil records transferred or received should be kept in either paper or electronic format. This will include the student's name, date of birth, where and to whom the records have been sent and the date sent and/or received. A copy of the child protection chronology sheet will also be retained for audit purposes.
 - When a designated safeguarding lead/ member of staff resigns their post/ no longer has child protection responsibility, there should be a full face to face handover/exchange of information with the new post holder.
 - All receipts confirming file transfer must be kept in accordance with the recommended retention periods. For further information refer to the archiving section.

6.2 Archiving

- The recommended retention periods are
 - When there has been a referral to Children's Social Work Services, the case file will be retained for **35 years** from the date the College closes the case.
 - If no referral has been made to Children's Social Work Service the child protection record should be retained until the **25th birthday of the Student**.
 - The decision of how and where to store these files will be made by the **Principal**. (NB: Due to sensitivity of the information, the records should continue to be held in a secure area with limited access e.g. Designated Staff or the Principal).

6.3 Access to files

- A student or their nominated representative has the legal right to see their file at any point. This is their right to access under the Data Protection Act 1998. It is important

to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner

6.4 Safe Destruction of the student record

Where records have been identified for destruction they should be disposed of securely at the end of the academic year (or as soon as practical before that time). Records which have been identified for destruction should be confidentially destroyed. This is because they will either contain personal or sensitive information, which is subject to the requirements of the Data Protection Act 1998 or they will contain information which is confidential to the College. Information should be shredded prior to disposal or confidential disposal can be arranged through private contractors. For audit purposes the College will maintain a list of records which have been destroyed and who authorised their destruction. This can be kept in either paper or an electronic format.

6.5 The College may share information with other agencies without the consent of students if;

- a child or young person is at risk of serious harm,
- a vulnerable adult is at risk of serious harm,
- if information sharing is necessary to prevent crime and disorder or if there is a court order in place which enables information to be disclosed.

The agencies that the College may share information with include:

- The Police
- District Councils
- Children Social Work Services
- Adult Social Care
- Schools and other providers of education and training (FE / HE)
- The Probation Service
- Youth Offending Teams (YOTs)
- Bodies within the National Health Service
- Connexions
- Multi Agency Risk Assessment Conference (MARAC)

The College will in all circumstances share this information securely with other agencies and ensure that they understand the limits of how this information can be used. Where it is reasonable to do so, the College will explain to the individual what information is being shared about them and the reasons why the information needs to be shared.

The College will co-operate with relevant agencies where the College is asked to:

- Provide information about a child, young person or their family where there are concerns about a child's wellbeing, or to contribute to an assessment under section 17 and 47 of the Children Act 1989 or a child protection inquiry;
- Undertake specific types of assessments as part of a core assessment or to provide a service for a child in need;
- Provide a report and attend a child protection conference.

It is generally presumed that a student may give consent or refuse to consent to the information being shared if they are over the age of 16. The College will always look to seek the consent of the individual before it considers whether to share any personal or

sensitive information about students with other agencies or parents / guardians. Students may give their consent explicitly or implicitly.

Students (16 years and over) may make a request to not share some sensitive information with their parents / guardians. The privacy rights of the student will be maintained in accordance with the Frazer guidelines, providing the College is satisfied that;

- The student is capable of either consenting / or not consenting
- The student has a general understanding of the likely consequences of making the decision / or not making the decision
- The student is able to understand, retain, use and weigh up the information relevant to the decision
- The student is able to consistently communicate their decision at all times
- The student has the capacity to make decisions which they understand may put them at risk, but they present no risk of significant harm to children or serious harm to other adults.

7. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

When a student or vulnerable adult tells the College about abuse they have suffered, staff will receive the disclosure by following the guidance below:

- Stay calm
- Do not transmit shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB: It is not education staffs role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards:

Staff must not deal with this themselves. Clear indications or disclosure of abuse must be reported to the Safeguarding Advisor – Jubar Miah or member of the Designated Safeguarding Team.

8. Working with parents and other agencies to protect children

Involving parents / carers

- Parents/carers should be aware that the College will take any reasonable action to safeguard the welfare of its student. In cases where the College has reason to be concerned that a child may be suffering significant harm, ill treatment or neglect or other forms of harm staff have no alternative but to follow the LSCB procedures and contact Children's Social Work Service Duty and Advice team to discuss their concern.
- In general, we will discuss concerns with parents/carers before approaching other agencies and will seek consent/to inform parents/carers when making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the Safeguarding Manager. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents/carers of a referral to another agency may increase the risk of significant harm to the child.
- Parents/carers are informed about our child protection policy through: school prospectus, website, newsletters etc. A safeguarding/child protection statement is prominent in the school foyer/reception area.

9. Multi-agency work

- The College works in partnership with other agencies in the best interests of the children, young people and vulnerable adults. Therefore the College will, where necessary, liaise with and make referrals to Children's Social Work Service. Referrals (contact) should be made, by the Safeguarding Designated Staff, to the CSWS advice and duty team (0113 3760336)- Where a child or young person already has a child protection social worker, the College will immediately contact the social worker involved, or in their absence the team manager of the child protection social worker.
- The College will co-operate with Children's Social Work Service where they are conducting child protection enquiries. Furthermore, the College will ensure representation at appropriate inter-agency meetings such as Initial and Review Child Protection Conferences, and Planning and Core Group meetings, as well as Family Support Meetings
- The College will provide reports as required for these meetings. If a representative is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents / carers at least 24 hours prior to the meeting.
- Where a student is subject to an inter-agency child protection plan or a Multi-agency Risk Management Plan, the College will contribute to the preparation implementation and review of the plan as appropriate.

10. Preventing radicalisation & Violent Extremism (refer to Appendix 3 for the Prevent Strategy).

Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups. The

process of radicalisation is different for every individual and is a process, not a one off event; it can take place over an extended period or within a very short time frame. It is important that staff are able to recognise possible signs and indicators of radicalisation.

Students may be vulnerable to exposure or involvement with groups or individuals who advocate violence as a means to a political or ideological end.

Students can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include family members or friends, direct contact with members, groups and organisations or, increasingly, through the internet, including through social media sites. This can put people at risk of being drawn into criminal activity and has the potential to cause significant harm.

Examples of extremist causes that have used violence to achieve their ends include animal rights, the far right (UK) and international terrorist organisations such as Al Qaeda and the Islamic State.

Potential indicators identified include:

- Use of inappropriate language
- Possession of violent extremist literature
- Changes in behaviour, language, clothing or appearance
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

PREVENT is part of the UK's counter terrorism strategy. It focusses on supporting and protecting vulnerable individuals who may be at risk of being exploited by radicalisers and subsequently drawn into terrorist related activity. PREVENT is not about race, religion or ethnicity, the programme is to prevent the exploitation of susceptible people.

Responding to concerns

If staff are concerned about a change in the behaviour of an individual or see something that concerns them (this could be a colleague too) they should seek advice appropriately from Jubar Miah - Single Point of Contact for Prevent.

Colleges are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

Effective early help relies on all staff to be vigilant and aware of the nature of the risk for children and young people, and what support may be available.

- The College will ensure that appropriate policies, procedures, risk assessments on the College's vulnerability to violent extremism and community partnerships are in place to aid the management of cases where concerns have been raised about the safety of the College and wider community.

- The College will adopt the approach and use professional judgement to implement strategies in individual cases where concerns have been raised about violent extremism. The College may draw on wider support from the community and other local partners to work with individuals or groups of students.
- A member of the Senior Management Team or the Single Point of Contact for Prevent may in certain circumstances take the decision to report any suspicious activity or concerns relating to violent extremism to the Police Counter Terrorism Unit. This will be done on a case by case basis and the report will be kept private and confidential from the wider College community to maintain the privacy rights of any individual.

11. The Colleges role in the prevention of abuse

The College will identify and provide opportunities for students to develop skills, concepts, attitudes and knowledge to promote their safety and well-being.

- Relevant issues will be addressed through the student induction and relevant tutorials. For example, self esteem, emotional literacy, assertiveness, power, sex and relationship education, e-safety, Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM) and anti- bullying.
- All policies which address issues of power and potential harm, will be linked, to ensure a whole College approach.

12. The role of the College in supporting students

Appropriate support will be offered to individual students who have experienced abuse or who have abused others.

- An individual support plan (where appropriate) will be devised, implemented and reviewed regularly for these students. This plan will detail areas of support, who will be involved, and the student's wishes and feelings. A written outline of the individual support plan will be kept in the safeguarding file.
- Where students have exhibited sexually inappropriate/harmful behaviour and/or abused others, the College will work with partner agencies and organisations to ensure an AIM checklist is completed where appropriate. Good practice dictates that there should be a co-ordinated multi-agency approach, in way of an AIM risk assessment (Assessment, Intervention and Moving on), to respond to their needs, which will include, parent/carers, youth justice (where appropriate), children's social work service and health.
- We will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.
- Students that abuse others will be responded to in a way that meets their needs as well as protecting others within the College community through a multi-agency risk assessment.

13. Children with additional needs

The College recognises that while all children have a right to be safe, some students *may* be more vulnerable to abuse e.g. those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents, etc.

When the College is considering excluding a vulnerable student and/or a student who is either subject to a S47 Child Protection plan or there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude.

14. A Safer College Culture

Governors have agreed and ratified the following policies which must be read in conjunction with this policy.

The College Whistle Blowing Policy provides guidance to staff and volunteers on how they can raise concerns and receive appropriate feedback on action taken, when staff have concerns about any adults behaviour (covers all staff, whether teaching, administrative, management or support, as well as volunteers and regular contractors (i.e security / cleaning staff).

14.1 Safer Recruitment, selection and pre-employment vetting

- The College pays full regard and commitment to following the safer recruitment, selection and pre-employment vetting procedures as outlined part three of Keeping Children Safe in Education and the College Safer Recruitment Policy.
- The College will maintain a single central record which demonstrates the relevant vetting checks required including: identity, qualifications, criminal convictions and right to work in the UK.
- All recruitment materials will include reference to the College's commitment to safeguarding and promoting the wellbeing of students.
- The College will ensure that all recruitment panels include at least one person that has undertaken safer recruitment training.
- The College will ensure that appropriate DBS risk assessments will be undertaken as required. Advice and support for carrying out the risk assessments can be accessed through the HR Unit.

14.2 Procedures in the event of an allegation against a member of staff or person in College

These procedures must be followed in any case in which it is alleged that a member of staff, governor, visiting professional, volunteer or contract staff has:-

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child
- Behaved in a way that indicates s/he is unsuitable to work with children.

Allegations against a member of staff, governor, volunteer or contract staff

Inappropriate behaviour by staff/volunteers could take the following forms:

- Physical includes, for example, intentional use of force as a punishment i.e. slapping, use of objects to hit with, throwing objects or rough physical handling.

- Emotional includes, for example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes which discriminate on the grounds of race, gender, disability or sexuality.
- Sexual includes, for example, sexualised behaviour towards student, sexual harassment, sexual assault and rape.
- Neglect: may include failing to act to protect a child or children, failing to seek medical attention or failure to carry out appropriate/proper risk assessment etc...

A safeguarding complaint that meets the above criteria must be reported to the Principal immediately. If the complaint involves the Principal then the Chair of Governors must be informed. The Principal should carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Principal **should not** carry out the investigation himself or interview students. As part of this initial consideration, the Principal should consult with the Designated Safeguarding Lead and the HR Unit who will then contact the Local Authority Designated Officer (LADO).

A multi-agency strategy meeting may be arranged to look at the complaint in its widest context, the Principal / Senior Member of Staff / Chair of Governors (where appropriate) must attend this meeting, which will be arranged by the LADO. All issues must be recorded and the outcome reached must be noted to ensure closure.

In many cases it may be appropriate to provide further training and support to staff/volunteers and ensure that they are clear about the expectations for their conduct.

In more serious cases, allegations may be investigated under the formal disciplinary procedures and, where allegations are upheld, formal warnings issued as well as specific training and support. In cases where children/young people may be at further risk and/or evidence/witnesses may be compromised and/or the allegations are so serious that they may, if upheld, constitute gross misconduct, suspension of the member of staff/volunteer may be appropriate and should be considered in line with the school's Disciplinary Policy.

Any staff/volunteers who are dismissed by the College for gross misconduct or cumulative misconduct relating to safeguarding of children/young people will be referred to the DBS for consideration of barring. Similarly, where the College has a reasonable belief that the member of staff/volunteer would have been dismissed by the College had they been employed at the time of the conclusion of investigations will be referred to the DBS. The school will keep written records of all of the above.

LADO Contacts: Ted O'Sullivan or Carolyn Hargreaves Tel: 0113 2478457.

Advice can also be sought from either of the two Named Senior Allegations Managers for education – Raminder Aujla – Team Manager Education and Year Early Years Safeguarding Team 0113 3951211, or Sophie Thompson Team Manager HR Schools Team – 0113 2474155.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, staff can contact any of the professionals named in the above paragraph, in addition to other whistleblowing channels which may be open to them.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday and Email: help@nspcc.org.uk.

Appendix1: Definitions and indicators of abuse

Reference: Working Together to Safeguard Children (DfE 2015)

Neglect: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Examples which may indicate neglect (it is not designed to be used as a checklist):

Hunger

Tiredness or listlessness

Child dirty or unkempt

Poorly or inappropriately clad for the weather

Poor school attendance or often late for school

Poor concentration

Affection or attention seeking behaviour

Untreated illnesses/injuries

Pallid complexion

Stealing or scavenging compulsively

Failure to achieve developmental milestones, for example growth, weight

Failure to develop intellectually or socially

Neurotic behaviour

Physical abuse: Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Examples which may indicate physical abuse (it is not designed to be used as a checklist):

Patterns of bruising; inconsistent account of how bruising or injuries occurred

Finger, hand or nail marks, black eyes

Bite marks

Round burn marks, burns and scalds

Lacerations, wealds

Fractures

Bald patches

Symptoms of drug or alcohol intoxication or poisoning

Unaccountable covering of limbs, even in hot weather

Fear of going home or parents being contacted

Fear of medical help

Fear of changing for PE
Inexplicable fear of adults or over-compliance
Violence or aggression towards others including bullying
Isolation from peers

Sexual abuse: Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse as can other children

Examples which may indicate sexual abuse (it is not designed to be used as a checklist):

Sexually explicit play or behaviour or age-inappropriate knowledge
Anal or vaginal discharge, soreness or scratching
Reluctance to go home
Inability to concentrate, tiredness
Refusal to communicate.
Thrush, Persistent complaints of stomach disorders or pains
Eating disorders, for example anorexia nervosa and bulimia
Attention seeking behaviour, self mutilation, substance abuse
Aggressive behaviour including sexual harassment or molestation
Unusually compliant
Regressive behaviour, Enuresis, soiling
Frequent or open masturbation, touching others inappropriately
Depression, withdrawal, isolation from peer group
Reluctance to undress for PE or swimming
Bruises, scratches in genital area

Emotional abuse: Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child in participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment

Examples which may indicate emotional abuse (it is not designed to be used as a checklist):

Over-reaction to mistakes, continual self deprecation

Delayed physical, mental, emotional development

Sudden speech or sensory disorders

Inappropriate emotional responses, fantasies

Neurotic behaviour: rocking, banging head, regression, tics and twitches

Self harming, drug or solvent abuse

Fear of parents being contacted

Running away / Going missing

Compulsive stealing

Masturbation, Appetite disorders - anorexia nervosa, bulimia

Soiling, smearing faeces, enuresis

N.B.: Some situations where children stop communication suddenly (known as “traumatic mutism”) may indicate maltreatment.

Reference: What to do if you are worried a child is being abused (DfE 2015)

Child Sexual Exploitation: Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power, sexual gratification or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Responses from parents

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

An unexpected delay in seeking treatment that is obviously needed

An unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)

Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development

Reluctance to give information or failure to mention other known relevant injuries

Frequent presentation of minor injuries

Unrealistic expectations or constant complaints about the child

Alcohol misuse or other drug/substance misuse

Parents request removal of the child from home

Violence between adults in the household

Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child

Not getting enough help with feeding leading to malnourishment

Poor toileting arrangements

Lack of stimulation

Unjustified and/or excessive use of restraint

Rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing, disabling wheelchair batteries

Unwillingness to try to learn a child's means of communication

Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting;

Misappropriation of a child's finances

Invasive procedures



Supporting the Rehabilitation of Offenders & Safeguarding Individuals

(Students who may have unspent Criminal Convictions)

1. Introduction

1.1 To help the College to reduce the risk of harm or injury to a member of the College community caused by any criminal behaviour of students, the College must know about any relevant unspent criminal convictions that any existing or potential student may have. Students will also be required to disclose if they have been arrested by the Police or if there are any ongoing police investigation or criminal proceedings being taken against them.

1.2 The College is mainly, but not exclusively interested with or in relevant incidents concerning;

- offences against a person (Only ABH, GBH or murder / Manslaughter)
- offences concerning the possession of, or using firearms / offensive weapons
- convictions for offences of a sexual nature
- convictions for offences involving unlawfully supplying controlled drugs or substances
- offences where individuals are currently serving a prison sentence for a relevant criminal conviction (ROTL)

All other disclosures will be given consideration by the designated to ensure that

1.3 Equality and inclusion is at the heart of this policy and the aim is to deliver an inclusive Policy to ensure that College is able to safely support the rehabilitation of students who may have criminal convictions, whilst taking steps to reduce any risks that any individuals may pose to members of the College community or property.

1.4 Roles and responsibilities;

- **Charlotte Duffy** – Designated Safeguarding Officer for dealing with students who have relevant unspent criminal convictions. This will include the collection of relevant information to complete a safeguarding risk assessment.
- **Jubar Miah** – Safeguarding Manager will have responsibility for overseeing the overall case management and risk assessments for students disclosing criminal offences and will case manage the most serious disclosures.
- **Safeguarding Risk Assessment Panel** – Will hold responsibility for considering the risk assessments for students who have relevant criminal convictions and taking a decision on a student's suitability for a course at Leeds College of Building.

2. Aims of the policy

2.1 To ensure the College operates an inclusive admissions policy to enable students who may have relevant unspent criminal convictions, reprimands, cautions or final warnings, to safely access educational opportunities at the College.

2.2 To ensure that students feel safe to declare any relevant unspent criminal convictions and for the College to maintain the students' rights to privacy and confidentiality. Information about an applicant's criminal record should not be disclosed to anyone in the organisation apart from those who have a genuine need to know.

- 2.3 To ensure the College takes reasonable and proportionate measures to assess, eliminate or control any risk posed by any students to other members of the College community or property.
- 2.4 To ensure that any delays caused to a student's application being processed owing to a declaration as outlined under section 1.2 of this Policy is kept to a minimum and is reasonable and proportionate. Therefore the College will aim to complete all enquires and respond to students within one month of receiving a completed 'ADM1' form.
- 2.5 To ensure that all students who declare a relevant unspent criminal conviction receives the appropriate support to enable them to successfully complete their course of study.

3. Disclosure

- 3.1 All current and prospective students must declare any unspent criminal convictions. This will extend to any ongoing police investigation or criminal proceedings being taken against them.
- 3.2 Disclosure can be made initially through the College application form, the student enrolment form or to a member of staff. Students will then be asked to disclose specific unspent relevant criminal conditions on an ADM1 form.
- 3.3 The Rehabilitation of Offenders Act 1974 gives people with 'spent' convictions, cautions, reprimands and final warnings the right not to disclose them when applying for most jobs, courses, insurance or other purposes. Therefore, if a criminal conviction, reprimand, caution or final warning is considered to be spent (see appendix A), then the student is not required to disclose this (see **Appendix 1**).
- 3.4 All disclosures must be referred confidentially and securely to Charlotte Duffy – Designated Safeguarding Officer for Criminal Convictions or Jubar Miah – Equality, Inclusion and Safeguarding Manager in her absence. All records will be kept securely within G://Safeguarding Case File and the HR Office.
- 3.5 The College will work in partnership with the Police, Probation Service, HM Prison Service, Children's Social Work Services and the Youth Offending Service, and any of those partners may at any time contact the College to make a disclosure. They will be able to make the disclosure to the Designated Safeguarding Officer or the Equality, Inclusion and Safeguarding Manager.
- 3.6 **Release of Offenders on Temporary Licence** – Applications for a course which are received for individuals who are currently serving prison sentences, will be dealt with in the normal way outlined under '4.0 Assessment of Risk', however, additional steps will require HMPS to disclose the proposed licence conditions for the individual making an application and:
- The relevant CM/AFD/FD will firstly need to consider if the College can reasonably supervise the student, under the proposed 'Placement Licence Conditions' and the CM/AFD/AD may sign the 'Placement Licence Conditions' if they are.
- 3.7 Failure to disclose a relevant unspent conviction could result in exclusion or disciplinary action by the college should the information come to light after enrolment. In the case of an application for an HE course, the matter will be reported to

UCAS/CUKAS, who will then take the matter forward under their established procedures. For FE and part time applications the matter will be raised with the College's designated Safeguarding Risk Assessment Panel.

4. Assessment of Risk

4.1 In the event of a disclosure concerning one of the relevant unspent conviction listed in 1.2, The Designated Safeguarding Officer will have responsibility for completing a risk assessment to ascertain if a student could on the balance of probabilities, present an unacceptable risk to the health, safety and welfare of students and staff, and/or to the security of assets for which the college is responsible.

4.2 Before the risk assessment is carried out, the Designated Safeguarding Officer will gather as much information as possible to inform the risk assessment. The sources may include, but not limited to information from the Police, Probation Service, Children's Social Work Services and the Youth Offending Service. The information obtained may include the following;

- **Nature of offence(s)**
- **Seriousness** – the gravity of the offence and sentence that is received.
- **When** - the offence(s) were committed and the age at which the offence(s) were committed.
- **Relevance** - to the management of risk in the College environment or related activities.
- **Context** – the circumstances, reasons and mitigating factors behind the offence(s).
- **Pattern of Offending**
- **Responsibility** – if the student took responsibility for the offence and cooperated with the investigation.
- **Change in circumstances** – what has changed since the offence(s), what issues have been addressed and what has been learnt.

4.3 The applicant should in all cases, have the opportunity to address any concerns that the College may have. This may be achieved through a face-to-face meeting with the applicant or a telephone call. It is important that the College makes it clear to the applicant that the purpose of the meeting is to discuss any relevant information that can inform their risk assessment. The questions that may be posed to the student should include;

- Why are you applying for this course?
- What makes you think you can do it?
- Can you tell me about your offence(s)?
- Why did you commit the offence(s)?
- Was there anything else happening in your life at the time?
- How did you feel at the time?
- How do you feel now?
- How can I be sure that you are not a risk?
- How is your life different now?

4.4 Initial Assessment & Decision (Stage 1)

The Designated Safeguarding Officer and the Equality, Inclusion and Safeguarding Manager will have discretion to make decisions on relevant offences and approve the application with no further action or a behaviour agreement (NFA).

4.5 Safeguarding Risk Assessment (Stage 2)

If the Designated Safeguarding Officer and the Equality, Inclusion and Safeguarding Manager conclude that a comprehensive risk assessment should be carried out to control or eliminate an issue(s) where a student may pose a serious risk of harm to a member of the College community or to college property, the Designated Safeguarding Officer will carry out a 'Safeguarding Risk Assessment' and refer the risk assessment to the Colleges 'Safeguarding Risk Assessment Panel'.

4.6 Safeguarding Risk Assessment Panel (Stage 3)

The safeguarding risk assessment outlined in 4.5, will be referred to a Safeguarding Panel. A minimum requirement of 3 members of staff, will constitute a quorum (one member of staff must be a member of the Senior Management Team and one member must be from the faculty area). The Safeguarding Risk Assessment Panel will normally consist of the following members who will have a vote at the panel meeting;

- The Safeguarding Manager and / or the HR Director (Senior Lead for Safeguarding)
- A Faculty Director or Assistant Faculty Director to which the applicant has applied
- Student Services Manager

In addition to the panel members being present at the meeting, the following member of staff will also be in attendance:

- The Designated Safeguarding Officer for students who have relevant criminal unspent convictions (will not have a vote and will attend to present the risk assessment).

The Panel may make a number of decisions:

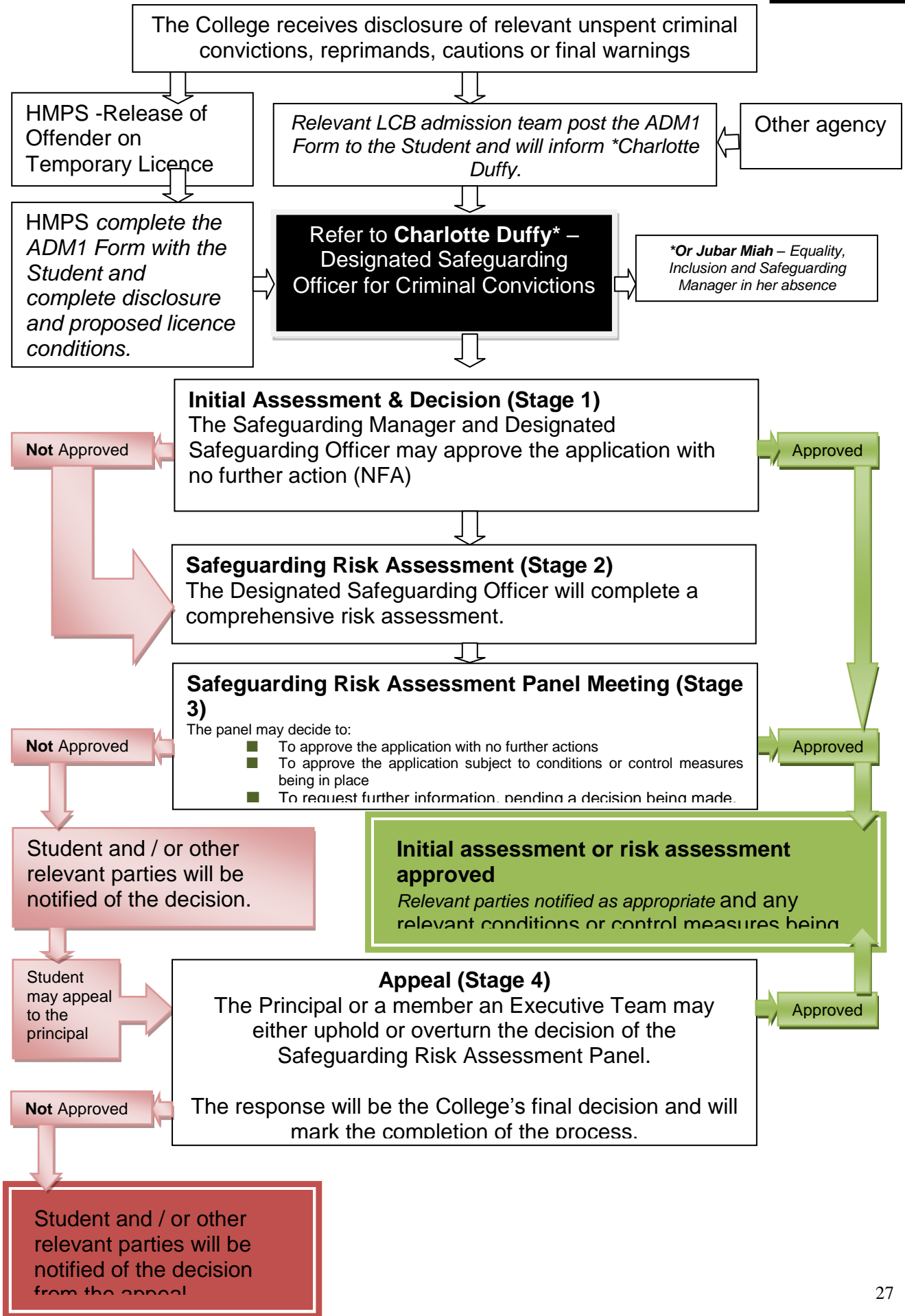
- To approve the application with no further actions.
- To approve the application subject to conditions or control measures being in place.
- To request further information, pending a decision being made.
- To decline the application.

4.7 Appeal against the decision of the Safeguarding Risk Assessment Panel (Stage 3)

Students or applicants, who may want to appeal against the decision of the Safeguarding Risk Assessment Panel, may appeal to a member of the Executive Team (Principal, Deputy Principal and Executive Director of Finance and Resources).

- The student or the applicant must appeal the decision within 10 working days of receiving the decision. The letter must be addressed to: The Principal, Leeds College of Building, North Street, Leeds, LS2 7QT.
- The student or the applicant will have the right to attend the appeal hearing if they wish to. The student must their intention to attend hearing in their appeal letter.
- The Principal or a member an Executive Team may either uphold or overturn the decision of the Safeguarding Risk Assessment Panel.

- A written response will be made within 10 working days of the appeal hearing. The Principal's or Executive Team Member's response will be the College's final decision and mark the completion of the process.
- Student and / or other relevant parties will be notified of the decision from the appeal.



'Spent'?

The *Rehabilitation of Offenders Act 1974* gives people with 'spent' convictions, cautions, reprimands and final warnings the right not to disclose them when applying for most jobs, courses, insurance or other purposes.

Important changes reducing rehabilitation periods under the Act were implemented on 10 March 2014.

The table below sets out the time it takes the main current sentences to become 'spent'.

Rehabilitation periods which start from the date of conviction with no buffer period

Sentence/disposal	Rehabilitation period for adults (aged 18 or over at the time of conviction or at the time the disposal is administered)	Rehabilitation period for young people (aged under 18 at the time of conviction, or at the time the disposal is administered)
Absolute discharge	'Spent' immediately	'Spent' immediately
Bind over	At the end of the order	At the end of the order
Compensation order	When paid in full	When paid in full
Conditional caution/ youth conditional caution	3 months or when caution ceases to have effect if earlier	3 months or when caution ceases to have effect if earlier
Conditional discharge order	At the end of the order	At the end of the order
Endorsements (imposed by a court)	5 years	2½ years
Fine	1 year	6 months
Hospital order (with or without restrictions)	When order ceases to have effect	When order ceases to have effect
Referral order	At the end of the order	At the end of the order
Relevant order	When order ceases to have effect	When order ceases to have effect
Reparation order	'Spent' immediately	'Spent' immediately
Simple caution/youth caution	'Spent' immediately	'Spent' immediately

Rehabilitation periods for custodial sentences and community sentences

Community order or youth rehabilitation order	Total length of order plus 1 year	Total length of order plus 6 months
Imprisonment or detention in a young offender institution for 6 months or less	Total length of order (including licence period) plus 2 years	Total length of order (including licence period) plus 18 months
Imprisonment or detention in a young offender institution for over 6 months and up to and including 30 months (2½ years)	Total length of order (including licence period) plus 4 years	Total length of order (including licence period) plus 2 years
Imprisonment or detention in a young offender institution for over 30 months (2½ years) and up to 48 months (4 years)	Total length of order (including licence period) plus 7 years	Total length of order (including licence period) plus 3½ years
Imprisonment or detention in a young offender institution for over 48 months (4 years) or a public protection sentence	Never 'Spent'	Never 'Spent'

A full list of rehabilitation periods for all sentences can be found at:
www.nacro.org.uk/roa

Nacro's Resettlement Advice Service
Call 0300 1231 999, Mon-Fri 9am-5pm Email: helpline@nacro.org.uk

Registered charity no. 226171.



changing lives
reducing crime



PREVENT STRATEGY AND PROCEDURES

It's about:

Preventing vulnerable people from becoming radicalised;

**Active citizenship and learning about values in modern
Britain;**

and learning to be safer together

Definitions

- **Radicalisation** is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- **An ideology** is a set of beliefs.
- **Safeguarding** is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- **Terrorism** is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause.
- **Vulnerability** describes factors and characteristics associated with being susceptible to radicalisation.
- **Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Calls for the death of British armed forces is also included.

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- **Critical**- an attack is expected imminently
- **Severe** – an attack is highly likely
- **Substantial** – an attack is a strong possibility
- **Moderate** – an attack is possible but not likely
- **Low** – an attack is unlikely

1.0 Introduction

- 1.1 The Counter Terrorism and Security Act [2015] introduces a General Duty on Colleges in the FE Sector to have due regard in the exercise of its functions, to the need to prevent people from being drawn into terrorism.
- 1.2 The UK faces a very real and ongoing threat from violent extremism. A small minority of individuals continue to present false arguments and reasoning that seek to justify attacks on innocent civilians and the Government is taking tough measures to prevent extremist voices and messages reaching those who are most vulnerable to these radical views. Early intervention to prevent individuals being drawn into extremist activity is crucial in order to safeguard them from the risks of being involved in such activity.
- 1.3 There is an important role for further education institutions, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. It is a condition of funding that all further education providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

2.0 Prevent

- 2.1 The Prevent strategy, published by the government in 2011, is part of the Governments overall counter-terrorism strategy, CONTEST (**COUNTER TERRORIST STRATEGY**). The CONTEST strategy has 4 key strands of work that have a different role to play in tackling the threat from extremism:
 - **Pursue** – to stop terrorist attacks;
 - **Prepare** – where an attack cannot be stopped, to mitigate its impact
 - **Protect** – to strengthen the overall protection against terrorist attacks;
 - **Prevent** – to stop people becoming terrorists or supporting terrorism.
- 2.2 The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as “prevent people from being drawn into terrorism”.

The Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

3.0 Vulnerability factors

- 3.1 The College will ensure that all staff are familiar with the factors that might contribute towards an individual becoming radicalised. The list below is not an exhaustive list and the presence of any of these factors does not necessarily mean that he/she will be involved in extremist activity. However, a combination of many of these factors may increase the vulnerability to extremist activity.

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues
- Over-identification with a group or ideology
- 'Them and Us' thinking
- Dehumanisation of the enemy
- Attitudes that justify offending
- Harmful means to an end
- Harmful objectives

4.0 Leadership

4.1 Governors and the College Management Team will work effectively to understand the risk of radicalisation and actively implement the Colleges Prevent Strategy and legal duty in the Counter Terrorism and Security Act [2015]. The College will specifically:

- Develop a 'Prevent' Strategy under the umbrella of the College's Safeguarding Policy & Procedures
- Ensure that the College engages with sub-contractors so they understand their responsibilities under the 'Prevent' Duty
- Understand the risk of radicalisation
- Ensure Governors, Managers and staff understand the risk and build capabilities to deal with any issues.
- Communicate and promote the importance of the duty
- Ensure that staff implement the duty effectively within the College.

4.2 **Karen Rolinson – Director of HR** is the Senior Lead for Safeguarding and Prevent. She will have senior management responsibility and oversight for the implementation of the Prevent Strategy.

4.3 **Jubar Miah – Equality, Inclusion and Safeguarding Manger** is the College's Single Point of Contact (SPOC) for Prevent. He will:

- be responsible for co-ordinating the development and implementation of the Prevent Strategy.
- have responsibility to case manage any prevent referrals concerning a student who is at risk of becoming radicalised.

5.0 Local Partnerships and Information Sharing

5.1 The College will take a multi-agency approach to protect people who are at the risk of radicalisation, cause for concern or counter terrorism activity. To do this, the

College will work in partnership with schools and colleges, BIS regional higher and further education Prevent co-ordinators, the Local Authority Prevent Co-ordinator, Children’s Social Work Services, the Police and the Channel Programme.

5.2 The College will have an information sharing protocol for work with the Police and other law enforcement agencies. This will include mechanisms to consider Section 29(3) Requests.

5.2 The College will also work with the following persons to manage any cases where concerns have been raised:

Name and address of contact	Contact number	Email
Nadeem Siddique Prevent Coordinator, Leeds City Council	0113 2476830 07712215005	nadeem.siddique@leeds.gov.uk .
Angela Eddison Channel Coordinator, West Yorkshire Police		angela.eddison@westyorkshirepolice.pnn.police.uk
1. DC 4809 Ruth WALSHAW 2. DC 2429 Darragh O’Shea Prevent Community Contact Officer North East Counter Terrorism Unit	1. 07590 357500 2. 07798781536	ruth.walshaw@westyorkshire.pnn.police.uk darragh.o'shea@westyorkshire.pnn.police.uk

6.0 Risk assessment

6.1 The College will carry out a risk assessment to assess when, where and how students or staff may be at risk of being drawn into terrorism. The College will use a RAG rated system which will flag up those areas needing action. The action plan will be developed to eliminate or control the risks safely. Some of the specific criteria the College will use to self-assess the level of risk will include:

- The safety and welfare of students and staff,
- The physical management of the College buildings and site security
- Incident Management
- Online safety and College IT facilities and protocols
- Suitable policy, procedures and monitoring arrangements for prayer and faith facilities
- Procedures for events held by staff, students or visitors,
- Relationships with external bodies and community groups who may use premises, or work in partnership with the institution.

7.0 Action Planning

7.1 To ensure the effective implementation of the Prevent Duty, the College will develop an action plan to include the following themes:

- Strategy & Procedures
- Leadership
- Marketing & Publicity
- Curriculum
- Sharing information
- Partnerships
- Risk Assessment

- Staff Training
- Property & Premises Security (inc. incident management)
- Welfare & Pastoral Support
- Recruitment
- IT Systems and Facilities (including *Wifi* and personal devices)
- Monitoring & Compliance

8.0 Staff Training

8.1 To ensure that staff implement the duty effectively within the College, Governors, Senior Leaders, Managers and Staff [*including 3rd party providers of service on behalf of the College*] will be appropriately briefed / trained to ensure that they understand their individual responsibilities under the 'Prevent' Duty. The College will ensure:

- Governors are briefed on their responsibilities
- Senior Management Team and College Management Team are briefed on their responsibilities
- All staff receive appropriate WRAP training
- All new staff receive appropriate training through Induction
- Curriculum staff will receive training on how to embed the 'Prevent Duty' within the Curriculum
- All staff will receive training to be able to appropriately challenge terrorist / extremism ideology.
- Estates & Security staff will receive training on specific threats to the security of College premises

9.0 Welfare and Pastoral Support

9.1 The College will provide support to individuals to prevent them from becoming radicalised. Where concerns have been raised about an individual, the College will complete a holistic needs assessment and ensure that sufficient pastoral care and support is available for all students. The Colleges Safeguarding Officers Team will have responsibility for assessing and co-ordinating the support for students. Holistic assessments of needs will consider:

- Physical, mental health & wellbeing
- Spiritual, moral, cultural, mental and physical development
- Feelings
- Attitudes arising from experiences of life
- How you see yourself
- Friends and family
- Living skills
- Skills and Abilities
- Education/Work
- Successes and achievements
- Hopes and aspirations for the future
- Network of support (personal, family and professional)
- Money matters
- Living at home
- Neighbourhood

9.2 The existing support and welfare services for students include:

- Free and confidential counselling service for learners and staff
- Multi-faith chaplaincy support [on request]
- Personal Advisors
- Designated safeguarding officers (children, young people and vulnerable adults)
- Tutor support
- Learning Mentors
- Specific support services for looked-after children (LAC)
- Information, advice and guidance (IAG)
- Money and Finance advice
- Signposting and referral relationships with external providers from statutory, voluntary and community sectors

10.0 Fundamental British Values - PREPARING FOR LIFE IN MODERN BRITAIN

10.1 The College is committed to promoting fundamental British values through the curriculum and more widely through the tutorial programme. The College will develop curriculum materials which promote human rights, British values, staying safe and encourage active citizenship through the curriculum to help prepare and support students for life in modern Britain and support them to become safer citizens (*in the context of preventing radicalisation to extremist ideology*). The fundamental British values are:

- **Democracy**
- **Respect for the rule of law**
- **Individual liberty**
- **Mutual respect and tolerance of those with different faiths and beliefs.**

In addition to British Values, values concerning rights and limitations to freedom of speech and right to life will also be promoted to students and staff.

- Human Rights Act [1998] – [*Right to life and freedom of speech*]

Students will understand their own rights and the rights of others and learn to respect the rule of English civil and criminal law. Learners will be encouraged to acquire respect for democracy and democratic processes, including respect for the basis on which the law is made and applied in England. Following the programme, students will gain:

- An understanding of how citizens can influence decision making through the democratic process
- An appreciation that living under the rule of law protects individual citizens and is essential for their well-being and safety
- An understanding that there is a separation of power between the executive and the judiciary, and that while some public bodies such as the police and the army can be held to account through Parliament, others such as the courts maintain independence
- An understanding that the freedom to choose and hold other faiths and beliefs is protected in law
- An acceptance that other people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour
- An understanding of the importance of identifying and combating discrimination as outlined in the Equality Act [2010] and Human Rights [1998].

11.0 Referral Procedures (please see 'Referral Pathway' on Page 7)

- 11.1 Staff will refer a cause for concern through existing safeguarding mechanisms to Jubar Miah who is the Designated Safeguarding Advisor and is the Single Point of Contact for Prevent at the College. The referral should be made to Karen Rolinson – HR Director in his absence.
- 11.2 The Designated Safeguarding Advisor will initially assess the risks and discuss the referral with the Senior Lead for Safeguarding (and the Principal if there is immediate risk to the public or a person).
- 11.3 The Designated Safeguarding Advisor will work with the student and other relevant agencies to address any issues of concern.
- 11.4 The Designated Safeguarding Advisor and the Senior Lead for Safeguarding may in some circumstance take the decision to report suspicious activities or concerns about an individual to the Confidential Anti-terrorist Hotline: **0800 789 321**, if the threat is immediate call:999

>>Referral Flowchart

